

DAVIS WRIGHT TREMAINE LLP  
Martin L. Fineman, Bar No. 104413  
505 Montgomery Street, Suite 800  
San Francisco, CA 94111  
Telephone: (415) 276-6575  
Facsimile: (415) 276-6599  
Email: martinfineman@dwt.com

NIRO HALLER & NIRO  
Raymond P. Niro  
(Member of the N.D. Cal. Bar)  
rniro@nshn.com  
Joseph N. Hosteny (*pro hac vice*)  
jhosteny@hosteny.com  
Arthur A. Gasey (*pro hac vice*)  
(gasey@nshn.com)  
181 West Madison Street, Suite 4600  
Chicago, Illinois 60602  
Telephone: (312) 236 – 0733  
Facsimile: (312) 236 – 3137

Attorneys for Plaintiff  
TECHNOLOGY LICENSING CORP.

Gregory L. Lippetz (State Bar No. 154228)  
glippetz@jonesday.com  
Kathleen D. Lynott (State Bar No. 268387)  
kdlynott@jonesday.com  
JONES DAY  
Silicon Valley Office  
1755 Embarcadero Road  
Palo Alto, CA 94303  
Telephone: (650) 739-3939  
Facsimile: (650) 739-3900

Attorneys for Defendant  
BLACKMAGIC DESIGN PTY LTD.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

**TECHNOLOGY LICENSING CORP.,**

**Plaintiff,**

**v.**

**BLACKMAGIC DESIGN PTY LTD.,**

**Defendant.**

**Case No. 4:13-CV-05184 SBA**

**SUPPLEMENTAL ~~PROPOSED~~  
CASE MANAGEMENT ORDER**

Pursuant to Rule 16 of the Federal Rules of Civil Procedure, the parties to the above-entitled action jointly submit this Supplemental [Proposed] Case Management Order to amend certain case deadlines (ECF Nos. 59, 61, and 63 ). The parties have met and conferred regarding the sufficiency of Technology Licensing Corporation's ("TLC") Infringement Contentions, served on March 6, 2014. Without agreeing that its present contentions are insufficient, and therefore as a compromise, TLC has agreed to amend its contentions, and to serve Amended Infringement Contentions on July 14, 2014. Accordingly, the parties hereby stipulate to amend deadlines triggered by service of infringement contentions per the Patent Local Rules. Additionally, to facilitate constructive mediation, the parties request that the Court extend the ADR deadline to September 1, 2014 so that representatives with settlement authority from each party may attend.

Current Deadline	Proposed Deadline	Event
None	July 14, 2014	Serve Amended "Disclosure of Asserted Claims and Infringement Contentions." (PLR 3-1). Produce any additional documents to accompany contentions. (PLR 3-2).
May 21, 2014	August 4, 2014	Serve "Invalidity Contentions." (PLR 3-3). Produce documents to accompany "Invalidity Contentions." (PLR 3-4).
June 9, 2014	August 18, 2014	Exchange of Proposed Terms for Construction. (PLR 4-1).
June 30, 2014	September 1, 2014	ADR Deadline
June 30, 2014	September 8, 2014	Exchange of Preliminary Claim Construction and Extrinsic Evidence. (PLR 4-2).
July 21, 2014	October 3, 2014	File Joint Claim Construction and Prehearing Statement. (PLR 4-3).
August 20, 2014	November 2, 2014	Close of Claim Construction discovery. (PLR-4-4).
September 4, 2014	November 17, 2014	Opening claim construction brief due. (PLR 4-5).
September 22, 2014	December 1, 2014	Responsive claim construction brief due. (PLR 4-5)

October 2, 2014	December 8, 2014	Reply claim construction brief due. (PLR 4-5)
October 17, 2014	December 12, 2014	2 Binders of each side's presentation slides for Claim construction hearing due.
October 23, 2014 at 10 AM	December 16, 2014 at 10 AM	Claim Construction Hearing (PLR 4-6)
50 days after the Court's service of the claim construction ruling	50 days after the Court's service of the claim construction ruling	Advice of counsel defense discovery due. (PLR 3-7).
TBD	TBD	Fact Discovery Cut-off
TBD	TBD	Designation of Opening Experts with Reports
TBD	TBD	Designation of Rebuttal Experts with Reports
TBD	TBD	Expert Discovery Cut-off
TBD	TBD	Dispositive motions and motions re experts due.
TBD	TBD	Pretrial Conference

Dated: June 17, 2014

Respectfully submitted,

JONES DAY

By: /s/ Gregory L. Lippetz  
Gregory L. Lippetz

Attorneys for Defendant  
BLACKMAGIC DESIGN PTY LTD.

NIRO, HALLER & NIRO

By: /s/ Joseph N. Hosteny  
Joseph N. Hosteny

Attorneys for Plaintiff  
TECHNOLOGY LICENSING  
CORPORATION

1                   **IT IS SO ORDERED.**

2       Dated: 6/17/2014

3                     
4                   HON. SAUNDRA BROWN ARMSTRONG  
5                   U.S. DISTRICT COURT JUDGE  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION**

I, Kathleen D. Lynott, an ECF User whose ID and password are being used to file this SUPPLEMENTAL [PROPOSED] CASE MANAGEMENT ORDER, in compliance with Civil L.R. 5-1(i)(3), hereby attest that Joseph N. Hosteny, attorney for Technology Licensing Corp., has concurred with this filing.

Dated June 17, 2014

By: /s/ Kathleen D. Lynott  
Kathleen D. Lynott

Attorneys for Defendant  
BLACKMAGIC DESIGN PTY LTD.